

The Basis for my Age Discrimination Complaint

01) I, Terry James Garrett, worked through LSI Temp Services from September 8, 1998 to October 19, 2012, assigned exclusively to Patterson Warehouses. The remarkable thing about my tenure, is that I'm the only temp to exceed age-sixty with a fourteen-year work record, a milestone accomplishment. There are two temps with longer work records, but I'm the oldest. We have persevered where thousands before have not.

02) Since permanent jobs aren't easily found, many job-seekers resort to temp employment. Some are okay in that benefits and the prospect of full-time employment are offered. Others are comparable to concentration-camps where unscrupulous bosses demean, verbally-abused, harass, and threaten with impunity. There is no grievance process or recourse. Longtime-temps must have a high tolerance level to remain employed

03) When abuses occur, there's a code-of-retribution for all temps who complain, quickly or insidiously replaced. I was insidiously and unjustly ousted from my fourteen-year employment, with my age as the only factor.

04) The best course for temps to remain employed, is that of being a valuable worker. Traits such as always on time, good work ethics, good communication skills, and high-attendance are assets. Comments concerning my job performance are as follows:

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- Terry, I'm glad to have a worker who takes pride in their work [Tom -manager]
 - Terry, you do a fine job with every assignment I give you [Rudy - manager]
 - Terry, you're the best LSI worker we've had [Russel - manager]
 - Terry, you've changed my entire opinion about black people [Shannon - Quality Controller]
 - Terry, if you quit I'm quitting too [Ricky - dock manager]
 - Terry, we never get complaints about you [Jeremy - LSI office management]
 - Terry, the female office-workers needs a restocking person, I'm choosing you [Jerry - manger]
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These comments are from management-level employees who consider my work an asset.

05) I was also an overtime worker in other departments during weekdays and also on weekends. My good workers' reputation placed me at the top of their requested-worker lists. For six of my fourteen-years, I had perfect attendance with no absences. I've never had vacation, very few lates, and never offered full-time employment. My warehouse skills included order-puller, pallet stacker, product-scanner, inventory checker, and dock lead-person. I've worked every job in my department, before becoming the dock-lead.

06) In 2004, Jeremy [LSI office] phoned with the news that my permanent work assignment is to remain on the dock. He explained that Patterson says that's where I excel. This meant no shuffling from job-to-job or daily call-ins. I mostly worked alone, but a new contract increased the work-load, which led to me being appointed the dock-lead. I've instructed a crew of as many as eight additional workers at one time.

07) Rudy [my supervisor at the time] assured me a pay raise commensurate with my responsibilities, but I never got one. I was tolerant, nothing I could do, and I never complained. When Ricky [new manager] replaced Rudy, he applied for raises but was told not within the budget. I did a good job anyway, and all shipping quotas were met in advance.

08) **Incident:** As time passed, a recently-hired manager came to building-A. He was Sidney Parnes, a black male like me. An ominous warning accompanied him "beware-of-Parnes." Break-room talk labeled Parnes as a bully with temps, especially the females. I gave Parnes the benefit of doubt and ignored the warning, but soon after I came to heed it.

- One day, Parnes was apparently timing someone's stay in the restroom, when he signaled for me to bang against the restroom door. I was leaving the water-fountain and he was hidden in the warehouse isle. The lady's restroom was the focus of his attention. I felt, if Parnes has a problem with someone why involve me. I told him I'd rather not. He got angry, put his hands on his hips and hostilely stared as I returned to the dock. Whether Parnes likes it or not, if something is unethical or illegal, I won't lend myself as a participant. It was his problem and I chose not to involve my self.

- A week later, after returning from break, Ricky [my manager] and Vicky [LSI on-site supervisor] beckoned me into the office. Parnes had deducted Eddie [a worker from a different department] and me fifteen-minutes pay for too long at the water fountain, an accusation that Ricky and Vicky considered absurd. It was a hot day and the fountain was in heavy use. Waiting-lines were expected.

- A Mexican-lady Maria and I left for the fountain together. Eddie came later, we shared drinking cycles while the water re-cooled, everyone does that. We're advised to hydrate on hot and Ozone-Alert days.

- Clearly Parnes was seeking revenge for me not banging on the restroom-door. I was his target. Eddie was totally innocent, thrown into the mix as part of Parnes' cover-up. I left and returned with Maria, but Parnes did not deduct Maria's pay. In Ricky and Vicky's opinion, Parnes was nit-picking in light of it being a very hot day, an oversight that revealed his malicious intention. Ricky said – so what, it's a hot day!

- Site manager Rick Landry stood with Parnes, in spite of Ricky's protest. To this day, Eddie and I are the only workers pay-deducted for a water-fountain infraction. This was the first disciplinary action ever, a bogus-accusation concocted by Parnes behind my back.

09) **Incident:** Soon after, Parnes came to me asking about a Walgreens' pallet. I told Parnes we didn't have any Walgreens, and I resumed my chores. He drove his cart across my path, and stated, "I know you didn't like being docked fifteen-minutes, but next time I'm docking your a#s [expletive] thirty-minutes." He profanely threatened me. I said, "Look dude, I have no idea what your problem is, but you need to shut-up talking to me." He said "Noooo, I can't let you talk back to me like that," and he called for Vicky to remove me from the premises.

- I found Ricky, told him how Parnes had threatened me. Ricky, out of anger, slammed his clipboard to the floor and said, that S.O.B. [expletive] shouldn't be saying anything to you. Said, if he needed something, should have come to him.

- Parnes, Ricky, and Vicky met in site manager Landry's office, again. Ricky and Vicky came out later and asked if I was okay, I said yes. Parnes had tried to fire me. Looking for Walgreens was a ruse. Said Parnes knew in advance there was no Walgreens, already discussed during the managers-meeting that morning. Site manager Landry roasted Parnes, ordered him not to say anything to me. Parnes had broken protocol by addressing me instead of Ricky, and faked the Walgreens search to battle with me. So it's obvious to Ricky and Vicky that Parnes has his scope set on me.

10) Years passed and Parnes eventually was assigned to Division -11 [our crew]. Ricky needed help with the workload, so he was given Parnes. Ricky did all shipping only, would do the shipping [more complicated], and Parnes will do the order-pulling, and personnel matters. So as lead-person on the dock Ricky was my boss exclusively.

- Parnes occasionally made sarcastic remarks, but they were mild in nature. When he needed my help, he addressed to me as Terry, other times I was "old man." Once after a basketball game, he commented to workers the next day, "that old man can play." It was a putdown-compliment, as opposed to saying, Terry plays quite well.

11) **Incident:** One Friday, Parnes out-of-spite phoned a female worker Debra at her home, saying that I said she left work early, eager to do drugs. A female supervisor Wendy witnessed our altercation that Monday morning, and intervened. I was car pooling with Debra because my auto was undergoing extensive repairs. I was angry, wanted to a face-off with Parnes and clear myself of his lie.

- Wendy explained to Debra that Parnes is a "s@# t starter [expletive]" [a person who creates chaos] and advised her not to trust what Parnes says. Debra mentioned to Wendy, how Parnes [a married man] had recently solicited her. I think Parnes was annoyed that Debra and I were in close proximity, riding back and forth to work in her car. And I think he concocted the jealous-lie to anger her into dropping me as her passenger. Wendy convinced Debra and me to overlook it. -- No person in Patterson-management would do something that degenerate.

12) **Incident:** Slow workdays are inevitable, so Parnes has a slow-day rule that anyone whose late will not be allowed in to work. He enacts and honors the rule at his privilege. I'm never late, but when I am it's an unavoidable circumstance.

- One morning, an interstate accident causing backed-up traffic for miles, made me and my passengers late. Their bosses didn't have Parnes' rule. They worked. Parnes denied me from working, which caused me to have an absent day. A lady named Chastity came five minutes after I went back home, the same traffic jam, but Parnes allowed her to work, a pretty girl who was practically new.

- He circumvented his rule for her, but denied me the lead-person. Angered everybody but me, because I'd come to expect disfavor from Parnes. He wanted me to take offense by complaining but I didn't. Ricky had crew member Walter to do the dock work. Vicky [LSI supervisor] and Wendy [Patterson supervisor] asked me the next morning was I okay, a sign that they were aware of what Parnes had done. I said yes. I'm okay. Parnes wanted to disrupt my good attendance record, and cause me to lose a full day's pay.

12) **Situation:** In May 2012, Ricky [my longtime boss] was temporarily used for vacation coverage in building-B. This meant Parnes had dock-shipping temporarily, and his order-pulling task as well. Parnes really needed my input because Ricky's procedures were vague to him. Parnes was cordial only because he benefitted from my experience, I was in reality training him. Ricky praised my dock skills and everyone knew it. Weeks later it was decided that Ricky's was needed for a new project elsewhere, and was not returning. So Parnes inherited dock-shipping as a full-time responsibility as well.

- When it was finalized that Ricky [my benefactor] was not returning to Devision 11, Parnes' attitude changed from cordial to hostile, overnight. Suddenly couldn't do anything to his satisfaction. He'd find fault in everything I did, and antagonized everything I'd say. Now Parnes has his long awaited opportunity to exact his pinned-up animosity on me, with no restrictions. He has me at his mercy now that Ricky is gone forever.

Now, at this juncture the only change, is that I've fallen under the supervision of an immoral supervisor, with especially devious and deceitful ways, whose long-term goal is to deprive me of my livelihood, because I'm an older and wiser person that he cannot stand.

13) **Incident:** A new QC was hired and she was given a new stacker Michael Wilson. There's a well-known syndrome that some temps reject instructions from other temps. They'll take instructions from full-time workers, but not from the temp in charge. Patterson is well aware of this attitude and knows exactly how to remedy it.

- As the lead-person, I'd ask Wilson to place his pallets in a specific order to simplify the sorting-process. He told me no. Said, he's doing what his QC says, instead of me. Normally Wilson should follow her instructions, but she's unfamiliar with dock procedures as a new employee. Ricky [who's now gone] would explain to the temp and QC, Terry's instructions are my instructions, end of story. Works every time, and the situation is defused.

- Oh no, but not Parnes, a person who creates chaos. He fueled the situation to point that Wilson and I became rivals. I explained to Parnes how Wilson is complicating the sort. The antagonistic Parnes reply was, "Have I ask you anything." Parnes dissuaded Wilson's cooperation. He instructed the new QC, if Terry [whose the coordinator] says anything to Wilson let me know. That was license for Wilson to persist. Parnes fueled the fire whereas Ricky would have drenched it. Wilson became flagrantly aggressive when he realized Parnes was siding in his favor.

- Maxwell, [Parnes's free wandering henchman] incites Wilson with hostility and profanity. That #%*@ MF [expletive] can't tell you what to do. Wilson [the naive youth] is emboldened by Maxwell's negativity, and steps up his aggression. Said, I don't care if you are sixty years old, I'll still kick your a#s [expletive]. Wilson flashes street-gang insignias and other nonsense intending to intimidate me. I can't imagine who told Wilson my age, but it was not I.

- Ended up, we both were suspended. Parnes claimed he was tired of our bickering. He set up the bickering! Wilson was never the target, he was the means. The shallow-minded Wilson was collateral damage, like **Eddie** in the **water-fountain incident**. Co-workers phoned that evening, said Parnes was grinning "I suspended Terry," not mentioning Wilson's name at all. They saw through his nonsense. The expendable new Wilson was unwittingly use. — This was my second disciplinary action, and if Ricky was there, Parnes would have never pulled it off.

- When Wilson and I returned, we genuinely became friends. To everyone's surprise, Parnes fired Wilson the following week. Said he was tired of Wilson's tardiness. Wilson was always tardy, but Parnes overlooked Wilson's tardiness, as well as caught with his cell phone twice [a fireable offence]. Parnes overrode Wilson's violations as long as he bickered with me. Had I broken the cell phone rule once, he would have suspended me. Parnes hoped Wilson and I would continue to bicker, but we didn't. Parnes was annoyed by our unanticipated friendship. When the easy-to-expend Wilson, no longer suited Parnes, purpose, he cut him.

14) **Situation**: After the Wilson incident cooled, Parnes approached me with a favorable attitude, said he's getting me a reliable helper. This was Elliot, came from building-B. We'd worked together on occasion, but he'd move from site-to-site. A couple of weeks later, Parnes told me to teach Elliot everything I knew. I thought that was so odd, and I immediately became suspicious. I expressed my concerns to Jerome, a Patterson manager in another department. He thought it was merely cross-training. I figured cross-training could be the case, because of a highly unusual promise made by Ronnie Miller, the site-manager for buildings A & B.

- On the Memorial Day weekend 2012, full-timers and temps were asked to work Memorial Monday, the day of the holiday. Usually full-timers work holidays, and temps are always excluded. For temps, this was our first chance ever for holiday work, and Patterson promised it at time-plus-half pay. Full-timers receive triple-time pay, a huge disparity. Temps signed the list anyway on that Saturday, for time-plus half pay.

- Come Sunday morning, temps were told that Memorial Day pay [the beginning of the new pay week] will be regular-pay for temps. Temps considered that a slap in the face, and refused to work by removing our names from the list. Since Patterson reneged on time-plus-half, temps preferred the no-pay off on the holiday.

- An uproar between full-timers and temps ensued. Off on Monday meant no triple-time work, cause temps were the manual labor. This is the only time in my memory, where temps collectively showed discontentment. Temps were praised by empathetic full-timers for their stance, and condemned by others for their lost of triple-time pay.

- An increasing number of full-timers, were expressing sympathy for the ill-treatment of temps, especially temps with accumulated years. Temps are required to always work at a fast pace, something I adhere to and can do with ease. I'm energetic, at home and after work. Full-timers think it's barbaric that after so many years, temps have no paid holidays or vacation.
- Office-ladies consider me a fine worker who deserves full-time employment. They depict me as the "Poster-Person" for Patterson's injustices. They've vexed Ronnie Miller, in my presence, "you'll need to give Terry a pay-raise and some vacation too." It was funny to see Miller put-to-shame with no response for the ladies. They promoted me as a deserving example.
- Memorial-Sunday, the announcement of no holiday pay for temps was an emotional-issue sparking heated arguments. Miller stopped all work, called a mass meeting of temps, full-timers, and managers. I'd never seen anything like it. He reluctantly announces that all Monday work was cancelled. Said everyone is hot and tired, worked fourteen-days consecutively.
- Miller made the promised of better toward temps. Said, temps contribute so much to our profits, especially those who've been with us for a long time. That amazed me coming from him. **Miller calmed the anger with the promise of better days for temps.** Temps were gleeful. With everything calmed, production resumed.

So, when Parnes said to train Elliot, I presumed vacation for me might be forthcoming based on Miller's promise of better day for temps. — And I was wrong as wrong can be.

15) After two weeks of cross-training, Elliot informed me that he was the new-lead. Workers warned me that Parnes' intention might be to replace me, based on their knowledge that no other lead-personnel was cross-training, just me.

- Turns out, I was duped into training my replacement. Now Elliot divulges to workers that's Parnes' next move is to catch me at sabotaging orders, in retaliation of my demotion. Elliot divulges that will be Parnes' way of firing me. Parnes presupposes that I'll retaliate out of revenge by sabotaging orders. That's part-two of Parnes scheme. — I think Parnes is judging me by his own devious character.
- Parnes promoted Elliot to rank of over me, now my role is Elliot's helper, an awkward position to work from. Parnes expected me to come pleading, I didn't because slaves even have dignity. But everyone else complained on my behalf. They considered Elliot over me too outrageous.
- As Elliot's helper, Parnes informs Elliot, and Elliot decides which part he wants me to do. He gives me my to-do instructions. I've gone from lead to cleanups, re-packing damaged cases, and pick-line salvaging, until Elliot needs my help on the dock. Maxwell and Elliot found this humorous, mocking and taunting, finger-pointing, snickering, he-he, ha-ha, he-he, and etc.

16) **Incident:** One day, Parnes instructed Elliot to remain on the dock, turned me and said building-B, to unload trucks. Normally truck unloading is reserved for younger men, not a person age sixty. Parnes angered the crew by sending me to unload trucks. They felt Elliot should have gone instead. Parnes was arrogantly disrespectful. If I refused, he'd cite me for insubordination. The truck crew was surprised to see me come. The Patterson QC Patricia, wouldn't allow me to unload trucks, had me label the pallets instead. She was respectful. — No other Patterson manager had ever assigned me to unloading trucks, an act by Parnes to demean.

17) **Incident:** We worked one Saturday, I had no idea work was scheduled for Sunday, and I returned on Monday. Monday morning, Big Larry, a worker from a different department, stated that Parnes asked him to work that Sunday. Said Sunday morning, Parnes instructed him to do my daily chores. Parnes gave Larry my demoted-chores. Larry says, had he known Parnes' was using him to replace me, he would not have come. Larry figured I would show as usual. Parnes misled Larry to deprived me of overtime, because he could. I also learned Parnes removed me from the overtime requested-worker's list.

18) **Incident:** I later discovered that Parnes replaced me as the stockroom clerk for the office-ladies. Miller beckoned me to come, said go to tend the ladies' needs. Peggy, who makes the list, said when she'd ask for me, Parnes would say Terry's too busy, and bring in the other guy [a reference to Elliot]. She said the last time Parnes said I was too busy, she replied, "tell Terry to come in at 7:00 A.M.." [an arrangement we've had for years].

- Peggy says Parnes came at 7:00 A.M. with the other guy, and together they re-stocked the supply-room. Said this time, she directly asked Miller [Parnes' boss] to get Terry, and he did. Said she explained to Miller, we do not want the other guy, just Terry. — Parnes came in at 7:A.M. to prevent me from the overtime pay I've gotten for years.

19) **Situation:** Parnes, with his zealous schemes, made an error-in-judgement by failing to anticipate the crew's reaction to Elliot as the new-lead. Crew members were repulsed, felt Elliot was not qualified to address their concerns. I'd done their jobs, and knew exactly what they needed.

- Coordinating their work with current shipping-requirements is something I could readily do. I earned the lead-spot through deeds [came up through the ranks], Elliot got it through villainy [a willingness to do Parnes' dirty work]. So the crew, in order to save time, continued to ask me, disregarding Elliot altogether. Elliot was seeking credence but the crew dismissed him as unworthy.

- This irritated Parnes. Accusations about me sabotaging orders and stealing bottled-water from the cooler were being invented. Co-workers knew my plight, because Maxwell and Elliot had launched a recruiting-effort [an anti-Terry campaign] with no success. Guys like Andre, Little Larry, Derrick, and Von were asked to side-up, instead they alerted me. It was common knowledge that Parnes was out to get me with Maxwell and Elliot was his muscle. Co-workers' advised me to avoid their pettiness, and I did by lengthening my distance.

20) **Incident:** Wednesday 10/17, Maxwell while passing my work location called me a “p#@*y MF,” an inflammatory remark intended to provoke into an altercation. Parnes was turning up the heat, because I’d distanced myself as my co-workers advised. He’s trying to force my hand.

- Parnes, using his advantage as my superior, entrapped me in a catch-22 predicament [frustrating circumstances with no means of escape or complacency]. I was damned if I did or damned if I don’t. If I confronted Maxwell /Elliot about the taunting, Parnes would fire me under twice for the same-offense rule. By overlooking their taunts, they’re encouraged to continue, making my workdays annoyingly stressful.

- So in my defense, I told everyone that Maxwell had called me a derogatory name, and Parnes put him up to it. What’s noticeable to me is that both are only aggressive inside the building, confident that Parnes will defend and protect them. — That’s the telltale sign that Parnes is the provocateur. Parnes exploits the criminal-element of their character [felons who can’t pass background checks to work elsewhere] to his advantage. After work, they scatter like mice, when Parnes’ can no longer provide them refuge.

By speaking in my defense, I broke Pattersons’ code-of-retribution for complainers. Since complainers must go, I expected their wrath, and didn’t care anymore. I was tired of Maxwell and Elliot’s taunts, so I spoke out to expose it.

21) Parnes is a narcissist, whose yet to realized nobody’s fooled by his nonsense. No way should Maxwell’s salary should be the same as mine. Mine should be commensurate with other lead-personnel, but it’s below. No way should I be Elliot’s subordinate, I was lead on the dock years before Parnes was hired. Parnes is cowardly too. He wouldn’t dare bully the younger-males, knowing they have a propensity for violence that I don’t. He’s bullying on me because I’m reserve by virtue of my age.

- Rationally thinking, if I needed replacing why Elliot. There are others more suited than he, a fact that exposes Parnes’ cynicism. Why not the guys with more years? Parnes replaced a fourteen-year employee in favor of a one-year, an expert for a novice, a non-felon with a parolee. Elliot’s only qualification was his willingness to help Parnes set me up, something scrupulous workers wouldn’t consider.

- On Thursday the 18th, I noticed Parnes met up with Miller on the dock, and they hurried outside. Both re-entered later, Parnes then called Maxwell and Elliot into a huddle, there was a loud burst of glee. Soon after Maxwell and Elliot walked by with smirks on their faces. They had a new bravado, very arrogant and cocky. I didn’t know why but I knew the meeting concerned me.

- On Friday 19th I was back on the dock doing my old job, but oddly Elliot was assigned to the far end or the warehouse, and I thought “wow a peaceful day.”

22) **Situation:** On Monday the 21st, the first person I saw at the check-in gate was Ronnie Miller. He's never at the check-in-gate, and my suspicion was immediately aroused. Jerry [LSI check in supervisor] said I was no longer in Division-11 [Parnes' crew], told me to step aside and he'll see if there's work somewhere else. Vicky, [LSI super whose familiar with Parnes antics] asked what was going on between us. So I told her. Vicky knows first-hand how dastardly Parnes is toward me.

- Others gathered, and I told them as well. They got hostile, started calling Parnes offensive names. I was not into waiting, felt out-of-sync, went home. My situation had become too much. I think Miller had preplanned to be at the entrance expecting me come pleading. So that's why Elliot and Maxwell were celebrating Thursday 18th, Parnes had persuaded Miller to force me from the building, — the retribution for me complaining about Maxwell's persistent taunting. Parnes brags to co-workers that I had to go because I complained too much, the net worth of his catch-22 entrapment.

Additional Information That May Be Beneficial in Non Chronological Order

23) When I returned home [Monday 21st], I called Richard [LSI Chief office manager] and explained my situation with Parnes. Richard replied, "I believe everything you've said, but I can't do anything about it. Patterson is our largest client." I asked Richard to find me work elsewhere. He said to call him the following morning. Richard knew I was being truthful for two reasons: LSI commends me on my work and female-temps have similar problems with Parnes.

24) Monday evening, I received several calls from co-workers. One was Tiffany Parsons, the lead-person in building-B. Tiffany says she asked Wayne [her Patterson manager] for me to work with her, and he approved it. She says Ronnie Miller, in her presence, overruled Wayne. Said he didn't want Terry working in any building.

- I also receive a call from co-worker Deborah Rogers. She said Wendy [Patterson manager] wanted me to know, that she asked Ronnie Miller for me in her department, and Miller said no to her. Ronnie Miller twice denied me from work in other departments, when they wanted me. That was tantamount to being fired, so it seems.

- Tuesday 22nd, co-worker Teresa Brooks called, said Miller was claiming him and I had a verbal-altercation, and that's why he wanted me out of the building. "Absolutely not true!" If that was the case why wasn't I terminated on the day he claims we argued. He made that up. Co-workers defended me by saying, if Terry and Miller were in an argument, Terry would have told us. It never, ever happened. I've never argued with Miller. Miller has no qualms about making up lies to defuse an uproar, same as he did with the Memorial Day uproar.

- What's happened is that Patterson has given Parnes too much leeway and he abused it. They've hired a bad-apple and its coming back to haunt them. Patterson tries to defend Parnes with untruths. **I deny that Miller and I ever had an altercation**, Miller said we argued to divert the truth.

25) My EEOC charge was Parnes' second in a three-month period. Patterson suspended Parnes three-days for a sexual-harassment charge made by a female-temp. She swears that Parnes fired her for not submitting to him sexually. Patterson was also shocked with the discovery that Parnes had fathered a child by another temp, which led to the breakup of his marriage. Patterson considers Parnes' behavior to be distasteful in light of a manager's position.

- When Parnes took a vacation-day, Maxwell [his partner-in-crime] was terminated in his absence. Patterson is being condemned by their own employees, for Parnes' maltreatment of me. I was heavily defended by the people I've worked with. Parnes is ostracized by his peers and they're pressing for his termination. Parnes was recently moved from Division 11[where he was my manager] to an isolated small-account in building C.

26) On page three of my EEOC complaint I stated that Ms. Juanita [a female black] who was years older than I, was harshly demeaned similar to me. She was a lead-person also, then demoted to menial chores, then told by Patterson she was no longer needed. She cried upon leaving and she never broke any rules. With me it wasn't that easy because I was popular and venerated. She was overtly told to leave. I was covertly forced to leave. The pattern here is that we both had no intention of leaving, but were unexpectedly demoted and railroaded, at an age that's difficult to find employment.

- Years ago a manager named Tom, terminated more than a dozen females upward of age fifty, over a two-week period. They were systematically eliminated one-by-one, Ms. Mozetta, Ms. Joyce, and Ms. Jean, all personal friends. It appears that LSI/Patterson has a secret agendum forbidding temps to reach retirement age, with me inclusive. To my knowledge not one temp has done that, and I was destined to be the first, a precedence setting event. My aim was work until age sixty-sixth, the year that my full Social Security benefits would to accrue.

27) I passed a criminal background-check for a new LSI job starting at \$17.75 per hr. LSI stalled and eventually avoided sending me to the site. Clearly, I was purged from their system. Kept saying I was coming up next, but when I called my pay-card LSI had deactivated it.

28) Miller, Parnes, Maxwell, and Elliot were the active conspirators. If one of the four had not participated, the ouster would not have worked. I think Miller was the impetus, at the urging of his superiors who had no intention of benefits for temps, in spite of Miller promise or full-time employees' empathy.

- Parnes did the planning from his repertoire of underhanded-tactics, while Miller turned his back pretending to be unaware. Maxwell and Elliot were the agitators acting at the behest of Parnes, who rewarded them privilege and favor above all other crew members. All four combined was the perfect-storm for my ouster.

Things about me that really upset Parnes. They may or may not be of value.

- * I was never broke in spite of my low wages
 - * Employees were respectful toward me with yes sir, and Mr. Terry or Mr. Garrett
 - * I've had three surprise birthday parties to his none
 - * Female office-workers occasionally pitch-in to buy me lunch,
 - * I transcend his stereotypical attitude that all temps are drug addicts, convicts, or alcoholics who live in boardinghouses
 - * Angry that I'm old and wise enough not to trust him
 - * I have a circle of friends that he can't fit in with
 - * I can play basketball as well he can in my early sixties
 - * Angry that I won't subserviently woo him like Maxwell and Elliot does
 - * Jealous, sees me a threat to his lustful desires
 - * Jealous, that my maturity level transcends his by twenty years
 - * Angry that people think more of me than him
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Conspirators

1. Ronnie Miller - Site Manager for building A & B
2. Sidney Parnes - Manager Division-11, but now shipped building C
3. Ulysses Maxwell - four year employee, fired for not working
4. Tony Elliot - one year employee

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- Terry, I'm glad to have a worker who takes pride in their work [Tom -manager]
 - Terry, you do a fine job with every assignment I give you [Rudy - manager]
 - Terry, you're the best LSI worker we've had [Russel - manager]
 - Terry, you've changed my entire opinion about black people [Shannon - Quality Controller]
 - Terry, if you quit I'm quitting too [Ricky - dock manager]
 - Terry, we never get complaints about you [Jeremy - LSI office management]
 - Terry, the female office-workers needs a restocking person, I'm choosing you [Jerry - manger]
-

These comments are from management-level employees who consider my work an asset.

05) I was also an overtime worker in other departments during weekdays and also on weekends. My good workers' reputation placed me at the top of their requested-worker lists. For six of my fourteen-years, I had perfect attendance with no absences. I've never had vacation, very few lates, and never offered full-time employment. My warehouse skills included order-puller, pallet stacker, product-scanner, inventory checker, and dock lead-person. I've worked every job in my department, before becoming the dock-lead.

06) In 2004, Jeremy [LSI office] phoned with the news that my permanent work assignment is to remain on the dock. He explained that Patterson says that's where I excel. This meant no shuffling from job-to-job or daily call-ins. I mostly worked alone, but a new contract increased the work-load, which led to me being appointed the dock-lead. I've instructed a crew of as many as eight additional workers at one time.

07) Rudy [my supervisor at the time] assured me a pay raise commensurate with my responsibilities, but I never got one. I was tolerant, nothing I could do, and I never complained. When Ricky [new manager] replaced Rudy, he applied for raises but was told not within the budget. I did a good job anyway, and all shipping quotas were met in advance.

08) **Incident:** As time passed, a recently-hired manager came to building-A. He was Sidney Parnes, a black male like me. An ominous warning accompanied him "beware-of-Parnes." Break-room talk labeled Parnes as a bully with temps, especially the females. I gave Parnes the benefit of doubt and ignored the warning, but soon after I came to heed it.

- One day, Parnes was apparently timing someone's stay in the restroom, when he signaled for me to bang against the restroom door. I was leaving the water-fountain and he was hidden in the warehouse isle. The lady's restroom was the focus of his attention. I felt, if Parnes has a problem with someone why involve me. I told him I'd rather not. He got angry, put his hands on his hips and hostilely stared as I returned to the dock. Whether Parnes likes it or not, if something is unethical or illegal, I won't lend myself as a participant. It was his problem and I chose not to involve my self.

- A week later, after returning from break, Ricky [my manager] and Vicky [LSI on-site supervisor] beckoned me into the office. Parnes had deducted Eddie [a worker from a different department] and me fifteen-minutes pay for too long at the water fountain, an accusation that Ricky and Vicky considered absurd. It was a hot day and the fountain was in heavy use. Waiting-lines were expected.

- A Mexican-lady Maria and I left for the fountain together. Eddie came later, we shared drinking cycles while the water re-cooled, everyone does that. We're advised to hydrate on hot and Ozone-Alert days.

- Clearly Parnes was seeking revenge for me not banging on the restroom-door. I was his target. Eddie was totally innocent, thrown into the mix as part of Parnes' cover-up. I left and returned with Maria, but Parnes did not deduct Maria's pay. In Ricky and Vicky's opinion, Parnes was nit-picking in light of it being a very hot day, an oversight that revealed his malicious intention. Ricky said – so what, it's a hot day!

- Site manager Rick Landry stood with Parnes, in spite of Ricky's protest. To this day, Eddie and I are the only workers pay-deducted for a water-fountain infraction. This was the first disciplinary action ever, a bogus-accusation concocted by Parnes behind my back.

09) **Incident:** Soon after, Parnes came to me asking about a Walgreens' pallet. I told Parnes we didn't have any Walgreens, and I resumed my chores. He drove his cart across my path, and stated, "I know you didn't like being docked fifteen-minutes, but next time I'm docking your a/s [expletive] thirty-minutes." He profanely threatened me. I said, "Look dude, I have no idea what your problem is, but you need to shut-up talking to me." He said "Noooo, I can't let you talk back to me like that," and he called for Vicky to remove me from the premises.

- I found Ricky, told him how Parnes had threatened me. Ricky, out of anger, slammed his clipboard to the floor and said, that S.O.B. [expletive] shouldn't be saying anything to you. Said, if he needed something, should have come to him.

- Parnes, Ricky, and Vicky met in site manager Landry's office, again. Ricky and Vicky came out later and asked if was I okay, I said yes. Parnes had tried to fire me. Looking for Walgreens was a ruse. Said Parnes knew in advance there was no Walgreens, already discussed during the managers-meeting that morning. Site manager Landry roasted Parnes, ordered him not to say anything to me. Parnes had broken protocol by addressing me instead of Ricky, and faked the Walgreens search to battle with me. So it's obvious to Ricky and Vicky that Parnes has his scope set on me.

10) Years passed and Parnes eventually was assigned to Division -11 [our crew]. Ricky needed help with the workload, so he was given Parnes. Ricky did all shipping only, would do the shipping [more complicated], and Parnes will do the order-pulling, and personnel matters. So as lead-person on the dock Ricky was my boss exclusively.

- Parnes occasionally made sarcastic remarks, but they were mild in nature. When he needed my help, he addressed to me as Terry, other times I was "old man." Once after a basketball game, he commented to workers the next day, "that old man can play." It was a putdown-compliment, as opposed to saying, Terry plays quite well.

11) **Incident:** One Friday, Parnes out-of-spite phoned a female worker Debra at her home, saying that I said she left work early, eager to do drugs. A female supervisor Wendy witnessed our altercation that Monday morning, and intervened. I was car pooling with Debra because my auto was undergoing extensive repairs. I was angry, wanted to a face-off with Parnes and clear myself of his lie.

- Wendy explained to Debra that Parnes is a "s@# t starter [expletive]" [a person who creates chaos] and advised her not to trust what Parnes says. Debra mentioned to Wendy, how Parnes [a married man] had recently solicited her. I think Parnes was annoyed that Debra and I were in close proximity, riding back and forth to work in her car. And I think he concocted the jealous-lie to anger her into dropping me as her passenger. Wendy convinced Debra and me to overlook it. -- No person in Patterson-management would do something that degenerate.

12) **Incident:** Slow workdays are inevitable, so Parnes has a slow-day rule that anyone whose late will not be allowed in to work. He enacts and honors the rule at his privilege. I'm never late, but when I am it's an unavoidable circumstance.

- One morning, an interstate accident causing backed-up traffic for miles, made me and my passengers late. Their bosses didn't have Parnes' rule. They worked. Parnes denied me from working, which caused me to have an absent day. A lady named Chastity came five minutes after I went back home, the same traffic jam, but Parnes allowed her to work, a pretty girl who was practically new.

- He circumvented his rule for her, but denied me the lead-person. Angered everybody but me, because I'd come to expect disfavor from Parnes. He wanted me to take offense by complaining but I didn't. Ricky had crew member Walter to do the dock work. Vicky [LSI supervisor] and Wendy [Patterson supervisor] asked me the next morning was I okay, a sign that they were aware of what Parnes had done. I said yes. I'm okay. Parnes wanted to disrupt my good attendance record, and cause me to lose a full day's pay.

12) **Situation:** In May 2012, Ricky [my longtime boss] was temporarily used for vacation coverage in building-B. This meant Parnes had dock-shipping temporarily, and his order-pulling task as well. Parnes really needed my input because Ricky's procedures were vague to him. Parnes was cordial only because he benefitted from my experience, I was in reality training him. Ricky praised my dock skills and everyone knew it. Weeks later it was decided that Ricky's was needed for a new project elsewhere, and was not returning. So Parnes inherited dock-shipping as a full-time responsibility as well.

- When it was finalized that Ricky [my benefactor] was not returning to Devision11, Parnes' attitude changed from cordial to hostile, overnight. Suddenly couldn't do anything to his satisfaction. He'd find fault in everything I did, and antagonized everything I'd say. Now Parnes has his long awaited opportunity to exact his pinned-up animosity on me, with no restrictions. He has me at his mercy now that Ricky is gone forever.

Now, at this juncture the only change, is that I've fallen under the supervision of an immoral supervisor, with especially devious and deceitful ways, whose long-term goal is to deprive me of my livelihood, because I'm an older and wiser person that he cannot stand.

13) **Incident:** A new QC was hired and she was given a new stacker Michael Wilson. There's a well-known syndrome that some temps reject instructions from other temps. They'll take instructions from full-time workers, but not from the temp in charge. Patterson is well aware of this attitude and knows exactly how to remedy it.

- As the lead-person, I'd ask Wilson to place his pallets in a specific order to simplify the sorting-process. He told me no. Said, he's doing what his QC says, instead of me. Normally Wilson should follow her instructions, but she's unfamiliar with dock procedures as a new employee. Ricky [who's now gone] would explain to the temp and QC, Terry's instructions are my instructions, end of story. Works every time, and the situation is defused.

- Oh no, but not Parnes, a person who creates chaos. He fueled the situation to point that Wilson and I became rivals. I explained to Parnes how Wilson is complicating the sort. The antagonistic Parnes reply was, "Have I ask you anything." Parnes dissuaded Wilson's cooperation. He instructed the new QC, if Terry [whose the coordinator] says anything to Wilson let me know. That was license for Wilson to persist. Parnes fueled the fire whereas Ricky would have drenched it. Wilson became flagrantly aggressive when he realized Parnes was siding in his favor.

- Maxwell, [Parnes's free wandering henchman] incites Wilson with hostility and profanity. That #%*@ MF [expletive] can't tell you what to do. Wilson [the naive youth] is emboldened by Maxwell's negativity, and steps up his aggression. Said, I don't care if you are sixty years old, I'll still kick your a#s [expletive]. Wilson flashes street-gang insignias and other nonsense intending to intimidate me. I can't imagine who told Wilson my age, but it was not I.

- Ended up, we both were suspended. Parnes claimed he was tired of our bickering. He set up the bickering! Wilson was never the target, he was the means. The shallow-minded Wilson was collateral damage, like **Eddie in the water-fountain incident**. Co-workers phoned that evening, said Parnes was grinning "I suspended Terry," not mentioning Wilson's name at all. They saw through his nonsense. The expendable new Wilson was unwittingly use. — This was my second disciplinary action, and if Ricky was there, Parnes would have never pulled it off.

- When Wilson and I returned, we genuinely became friends. To everyone's surprise, Parnes fired Wilson the following week. Said he was tired of Wilson's tardiness. Wilson was always tardy, but Parnes overlooked Wilson's tardiness, as well as caught with his cell phone twice [a fireable offence]. Parnes overrode Wilson's violations as long as he bickered with me. Had I broken the cell phone rule once, he would have suspended me. Parnes hoped Wilson and I would continue to bicker, but we didn't. Parnes was annoyed by our unanticipated friendship. When the easy-to-expend Wilson, no longer suited Parnes, purpose, he cut him.

14) **Situation:** After the Wilson incident cooled, Parnes approached me with a favorable attitude, said he's getting me a reliable helper. This was Elliot, came from building-B. We'd worked together on occasion, but he'd move from site-to-site. A couple of weeks later, Parnes told me to teach Elliot everything I knew. I thought that was so odd, and I immediately became suspicious. I expressed my concerns to Jerome, a Patterson manager in another department. He thought it was merely cross-training. I figured cross-training could be the case, because of a highly unusual promise made by Ronnie Miller, the site-manager for buildings A & B.

- On the Memorial Day weekend 2012, full-timers and temps were asked to work Memorial Monday, the day of the holiday. Usually full-timers work holidays, and temps are always excluded. For temps, this was our first chance ever for holiday work, and Patterson promised it at time-plus-half pay. Full-timers receive triple-time pay, a huge disparity. Temps signed the list anyway on that Saturday, for time-plus half pay.

- Come Sunday morning, temps were told that Memorial Day pay [the beginning of the new pay week] will be regular-pay for temps. Temps considered that a slap in the face, and refused to work by removing our names from the list. Since Patterson reneged on time-plus-half, temps preferred the no-pay off on the holiday.

- An uproar between full-timers and temps ensued. Off on Monday meant no triple-time work, cause temps were the manual labor. This is the only time in my memory, where temps collectively showed discontentment. Temps were praised by empathetic full-timers for their stance, and condemned by others for their lost of triple-time pay.

- An increasing number of full-timers, were expressing sympathy for the ill-treatment of temps, especially temps with accumulated years. Temps are required to always work at a fast pace, something I adhere to and can do with ease. I'm energetic, at home and after work. Full-timers think it's barbaric that after so many years, temps have no paid holidays or vacation.
- Office-ladies consider me a fine worker who deserves full-time employment. They depict me as the "Poster-Person" for Patterson's injustices. They've vexed Ronnie Miller, in my presence, "you'll need to give Terry a pay-raise and some vacation too." It was funny to see Miller put-to-shame with no response for the ladies. They promoted me as a deserving example.
- Memorial-Sunday, the announcement of no holiday pay for temps was an emotional-issue sparking heated arguments. Miller stopped all work, called a mass meeting of temps, full-timers, and managers. I'd never seen anything like it. He reluctantly announces that all Monday work was cancelled. Said everyone is hot and tired, worked fourteen-days consecutively.
- Miller made the promised of better toward temps. Said, temps contribute so much to our profits, especially those who've been with us for a long time. That amazed me coming from him. **Miller calmed the anger with the promise of better days for temps.** Temps were gleeful. With everything calmed, production resumed.

So, when Parnes said to train Elliot, I presumed vacation for me might be forthcoming based on Miller's promise of better day for temps. — And I was wrong as wrong can be.

15) After two weeks of cross-training, Elliot informed me that he was the new-lead. Workers warned me that Parnes' intention might be to replace me, based on their knowledge that no other lead-personnel was cross-training, just me.

- Turns out, I was duped into training my replacement. Now Elliot divulges to workers that's Parnes' next move is to catch me at sabotaging orders, in retaliation of my demotion. Elliot divulges that will be Parnes' way of firing me. Parnes presupposes that I'll retaliate out of revenge by sabotaging orders. That's part-two of Parnes scheme. — I think Parnes is judging me by his own devious character.
- Parnes promoted Elliot to rank of over me, now my role is Elliot's helper, an awkward position to work from. Parnes expected me to come pleading, I didn't because slaves even have dignity. But everyone else complained on my behalf. They considered Elliot over me too outrageous.
- As Elliot's helper, Parnes informs Elliot, and Elliot decides which part he wants me to do. He gives me my to-do instructions. I've gone from lead to cleanups, re-packing damaged cases, and pick-line salvaging, until Elliot needs my help on the dock. Maxwell and Elliot found this humorous, mocking and taunting, finger-pointing, snickering, he-he, ha-ha, he-he, and etc.

16) **Incident:** One day, Parnes instructed Elliot to remain on the dock, turned me and said building-B, to unload trucks. Normally truck unloading is reserved for younger men, not a person age sixty. Parnes angered the crew by sending me to unload trucks. They felt Elliot should have gone instead. Parnes was arrogantly disrespectful. If I refused, he'd cite me for insubordination. The truck crew was surprised to see me come. The Patterson QC Patricia, wouldn't allow me to unload trucks, had me label the pallets instead. She was respectful. — No other Patterson manager had ever assigned me to unloading trucks, an act by Parnes to demean.

17) **Incident:** We worked one Saturday, I had no idea work was scheduled for Sunday, and I returned on Monday. Monday morning, Big Larry, a worker from a different department, stated that Parnes asked him to work that Sunday. Said Sunday morning, Parnes instructed him to do my daily chores. Parnes gave Larry my demoted-chores. Larry says, had he known Parnes' was using him to replace me, he would not have come. Larry figured I would show as usual. Parnes misled Larry to deprived me of overtime, because he could. I also learned Parnes removed me from the overtime requested-worker's list.

18) **Incident:** I later discovered that Parnes replaced me as the stockroom clerk for the office-ladies. Miller beckoned me to come, said go to tend the ladies' needs. Peggy, who makes the list, said when she'd ask for me, Parnes would say Terry's too busy, and bring in the other guy [a reference to Elliot]. She said the last time Parnes said I was too busy, she replied, "tell Terry to come in at 7:00 A.M.." [an arrangement we've had for years].

- Peggy says Parnes came at 7:00 A.M. with the other guy, and together they re-stocked the supply-room. Said this time, she directly asked Miller [Parnes' boss] to get Terry, and he did. Said she explained to Miller, we do not want the other guy, just Terry. — Parnes came in at 7:A.M. to prevent me from the overtime pay I've gotten for years.

19) **Situation:** Parnes, with his zealous schemes, made an error-in-judgement by failing to anticipate the crew's reaction to Elliot as the new-lead. Crew members were repulsed, felt Elliot was not qualified to address their concerns. I'd done their jobs, and knew exactly what they needed.

- Coordinating their work with current shipping-requirements is something I could readily do. I earned the lead-spot through deeds [came up through the ranks], Elliot got it through villainy [a willingness to do Parnes' dirty work]. So the crew, in order to save time, continued to ask me, disregarding Elliot altogether. Elliot was seeking credence but the crew dismissed him as unworthy.

- This irritated Parnes. Accusations about me sabotaging orders and stealing bottled-water from the cooler were being invented. Co-workers knew my plight, because Maxwell and Elliot had launched a recruiting-effort [an anti-Terry campaign] with no success. Guys like Andre, Little Larry, Derrick, and Von were asked to side-up, instead they alerted me. It was common knowledge that Parnes was out to get me with Maxwell and Elliot was his muscle. Co-workers' advised me to avoid their pettiness, and I did by lengthening my distance.

20) **Incident:** Wednesday 10/17, Maxwell while passing my work location called me a “p#@*y MF,” an inflammatory remark intended to provoke into an altercation. Parnes was turning up the heat, because I’d distanced myself as my co-workers advised. He’s trying to force my hand.

- Parnes, using his advantage as my superior, entrapped me in a catch-22 predicament [frustrating circumstances with no means of escape or complacency]. I was damned if I did or damned if I don’t. If I confronted Maxwell /Elliot about the taunting, Parnes would fire me under twice for the same-offense rule. By overlooking their taunts, they’re encouraged to continue, making my workdays annoyingly stressful.

- So in my defense, I told everyone that Maxwell had called me a derogatory name, and Parnes put him up to it. What’s noticeable to me is that both are only aggressive inside the building, confident that Parnes will defend and protect them. — That’s the telltale sign that Parnes is the provocateur. Parnes exploits the criminal-element of their character [felons who can’t pass background checks to work elsewhere] to his advantage. After work, they scatter like mice, when Parnes’ can no longer provide them refuge.

By speaking in my defense, I broke Pattersons’ code-of-retribution for complainers. Since complainers must go, I expected their wrath, and didn’t care anymore. I was tired of Maxwell and Elliot’s taunts, so I spoke out to expose it.

21) Parnes is a narcissist, whose yet to realized nobody’s fooled by his nonsense. No way should Maxwell’s salary should be the same as mine. Mine should be commensurate with other lead-personnel, but it’s below. No way should I be Elliot’s subordinate, I was lead on the dock years before Parnes was hired. Parnes is cowardly too. He wouldn’t dare bully the younger-males, knowing they have a propensity for violence that I don’t. He’s bullying on me because I’m reserve by virtue of my age.

- Rationally thinking, if I needed replacing why Elliot. There are others more suited than he, a fact that exposes Parnes’ cynicism. Why not the guys with more years? Parnes replaced a fourteen-year employee in favor of a one-year, an expert for a novice, a non-felon with a parolee. Elliot’s only qualification was his willingness to help Parnes set me up, something scrupulous workers wouldn’t consider.

- On Thursday the 18th, I noticed Parnes met up with Miller on the dock, and they hurried outside. Both re-entered later, Parnes then called Maxwell and Elliot into a huddle, there was a loud burst of glee. Soon after Maxwell and Elliot walked by with smirks on their faces. They had a new bravado, very arrogant and cocky. I didn’t know why but I knew the meeting concerned me.

- On Friday 19th I was back on the dock doing my old job, but oddly Elliot was assigned to the far end or the warehouse, and I thought “wow a peaceful day.”

22) **Situation:** On Monday the 21st, the first person I saw at the check-in gate was Ronnie Miller. He's never at the check-in-gate, and my suspicion was immediately aroused. Jerry [LSI check in supervisor] said I was no longer in Division-11 [Parnes' crew], told me to step aside and he'll see if there's work somewhere else. Vicky, [LSI super whose familiar with Parnes antics] asked what was going on between us. So I told her. Vicky knows first-hand how dastardly Parnes is toward me.

- Others gathered, and I told them as well. They got hostile, started calling Parnes offensive names. I was not into waiting, felt out-of-sync, went home. My situation had become too much. I think Miller had preplanned to be at the entrance expecting me come pleading. So that's why Elliot and Maxwell were celebrating Thursday 18th, Parnes had persuaded Miller to force me from the building, — the retribution for me complaining about Maxwell's persistent taunting. Parnes brags to co-workers that I had to go because I complained too much, the net worth of his catch-22 entrapment.

Additional Information That May Be Beneficial in Non Chronological Order

23) When I returned home [Monday 21st], I called Richard [LSI Chief office manager] and explained my situation with Parnes. Richard replied, "I believe everything you've said, but I can't do anything about it. Patterson is our largest client." I asked Richard to find me work elsewhere. He said to call him the following morning. Richard knew I was being truthful for two reasons: LSI commends me on my work and female-temps have similar problems with Parnes.

24) Monday evening, I received several calls from co-workers. One was Tiffany Parsons, the lead-person in building-B. Tiffany says she asked Wayne [her Patterson manager] for me to work with her, and he approved it. She says Ronnie Miller, in her presence, overruled Wayne. Said he didn't want Terry working in any building.

- I also receive a call from co-worker Deborah Rogers. She said Wendy [Patterson manager] wanted me to know, that she asked Ronnie Miller for me in her department, and Miller said no to her. Ronnie Miller twice denied me from work in other departments, when they wanted me. That was tantamount to being fired, so it seems.

- Tuesday 22nd, co-worker Teresa Brooks called, said Miller was claiming him and I had a verbal-altercation, and that's why he wanted me out of the building. "Absolutely not true!" If that was the case why wasn't I terminated on the day he claims we argued. He made that up. Co-workers defended me by saying, if Terry and Miller were in an argument, Terry would have told us. It never, ever happened. I've never argued with Miller. Miller has no qualms about making up lies to defuse an uproar, same as he did with the Memorial Day uproar.

- What's happened is that Patterson has given Parnes too much leeway and he abused it. They've hired a bad-apple and its coming back to haunt them. Patterson tries to defend Parnes with untruths. **I deny that Miller and I ever had an altercation**, Miller said we argued to divert the truth.

25) My EEOC charge was Parnes' second in a three-month period. Patterson suspended Parnes three-days for a sexual-harassment charge made by a female-temp. She swears that Parnes fired her for not submitting to him sexually. Patterson was also shocked with the discovery that Parnes had fathered a child by another temp, which led to the breakup of his marriage. Patterson considers Parnes' behavior to be distasteful in light of a manager's position.

- When Parnes took a vacation-day, Maxwell [his partner-in-crime] was terminated in his absence. Patterson is being condemned by their own employees, for Parnes' maltreatment of me. I was heavily defended by the people I've worked with. Parnes is ostracized by his peers and they're pressing for his termination. Parnes was recently moved from Division 11[where he was my manager] to an isolated small-account in building C.

26) On page three of my EEOC complaint I stated that Ms. Juanita [a female black] who was years older than I, was harshly demeaned similar to me. She was a lead-person also, then demoted to menial chores, then told by Patterson she was no longer needed. She cried upon leaving and she never broke any rules. With me it wasn't that easy because I was popular and venerated. She was overtly told to leave. I was covertly forced to leave. The pattern here is that we both had no intention of leaving, but were unexpectedly demoted and railroaded, at an age that's difficult to find employment.

- Years ago a manager named Tom, terminated more than a dozen females upward of age fifty, over a two-week period. They were systematically eliminated one-by-one, Ms. Mozetta, Ms. Joyce, and Ms. Jean, all personal friends. It appears that LSI/Patterson has a secret agendum forbidding temps to reach retirement age, with me inclusive. To my knowledge not one temp has done that, and I was destined to be the first, a precedence setting event. My aim was work until age sixty-sixth, the year that my full Social Security benefits would to accrue.

27) I passed a criminal background-check for a new LSI job starting at \$17.75 per hr. LSI stalled and eventually avoided sending me to the site. Clearly, I was purged from their system. Kept saying I was coming up next, but when I called my pay-card LSI had deactivated it.

28) Miller, Parnes, Maxwell, and Elliot were the active conspirators. If one of the four had not participated, the ouster would not have worked. I think Miller was the impetus, at the urging of his superiors who had no intention of benefits for temps, in spite of Miller promise or full-time employees' empathy.

- Parnes did the planning from his repertoire of underhanded-tactics, while Miller turned his back pretending to be unaware. Maxwell and Elliot were the agitators acting at the behest of Parnes, who rewarded them privilege and favor above all other crew members. All four combined was the perfect-storm for my ouster.

Things about me that really upset Parnes. They may or may not be of value.

- * I was never broke in spite of my low wages
 - * Employees were respectful toward me with yes sir, and Mr. Terry or Mr. Garrett
 - * I've had three surprise birthday parties to his none
 - * Female office-workers occasionally pitch-in to buy me lunch,
 - * I transcend his stereotypical attitude that all temps are drug addicts, convicts, or alcoholics who live in boardinghouses
 - * Angry that I'm old and wise enough not to trust him
 - * I have a circle of friends that he can't fit in with
 - * I can play basketball as well he can in my early sixties
 - * Angry that I won't subserviently woo him like Maxwell and Elliot does
 - * Jealous, sees me a threat to his lustful desires
 - * Jealous, that my maturity level transcends his by twenty years
 - * Angry that people think more of me than him
-

Conspirators

1. Ronnie Miller - Site Manager for building A & B
2. Sidney Parnes - Manager Division-11, but now shipped building C
3. Ulysses Maxwell - four year employee, fired for not working
4. Tony Elliot - one year employee